

DOLLY M. TROMPETER, ESQ.
CA Bar ID No. 235784
Peña & Bromberg, PLC
3467 W. Shaw Ave., Ste 100
Fresno, CA 93711
Telephone: 415-271-8604
Fax: 866-282-6709
dolly@dollydisabilitylaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Karissa Jaylene Andrade,
Plaintiff,

vs.

Frank Bisignano, COMMISSIONER OF
SOCIAL SECURITY¹,
Defendant.

Case No. 1:25-cv-00124-SKO

**STIPULATION AND
UNOPPOSED MOTION FOR
EXTENSION OF TIME; ORDER**

(Doc. 14)

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from June 17, 2025 to July 17, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION

¹ Frank Bisignano became the Commissioner of Social Security on May 7, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due to the case recently being assigned to the undersigned Plaintiff's Counsel. Counsel also has several merit briefs being due on the same week. For the weeks of June 17, 2025 and June 23, 2025, Plaintiff's Counsel has three Merit briefs, three Reply briefs, and seven EAJA negotiations and Motions due. Counsel requires additional time to brief the issues thoroughly for the Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: June 17, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: June 17, 2025

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

By: */s/ Justin Lane Martin
Justin Lane Martin
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on June 17, 2025)

ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion (Doc. 14), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS ORDERED that Plaintiff shall have up to and including July 17, 2025, to serve Plaintiff's Motion for Summary Judgment on Defendant. All other dates in the Scheduling Order (Doc. 4) are enlarged accordingly.

IT IS SO ORDERED.

Dated: **June 17, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE